

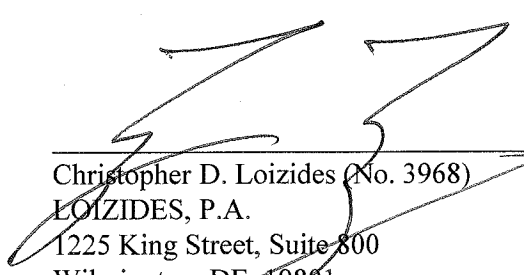
**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 7
)	
AMERICAN BUSINESS FINANCIAL)	Case No. 05-10203 (MFW)
SERVICES, INC., <i>et al.</i> ¹ ,)	
)	
Debtors.)	
<hr style="border: 0.5px solid black;"/>		
)	
George L. Miller, Chapter 7 Trustee for)	
the Bankruptcy Estates of American)	
Business Financial Services, Inc., <i>et al.</i> ,)	
)	
Plaintiff,)	Adv. Proc. No. 07-50132 (KG)
)	
v.)	
)	
Rose Piccolo,)	JURY TRIAL DEMANDED
)	
Defendant.)	Objection Deadline: August 9, 2007
<hr style="border: 0.5px solid black;"/>		

**DEFENDANT'S MOTION
TO WITHDRAW THE REFERENCE**

For the reasons in the attached memorandum of law, defendant requests that the District Court withdraw the reference of the above-captioned adversary proceeding pursuant to 28 U.S.C. § 157(d).

DATED: July 27, 2007



Christopher D. Loizides (No. 3968)
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Counsel for Rose Piccolo

¹ On January 21, 2005, American Business Financial Services, Inc. filed Case No. 05-10203, Tiger Relocation Company filed Case No. 05-10204, American Business Credit, Inc. filed Case No. 05-10206, Home American Credit, Inc. filed Case No. 05-10207, and American Business Mortgage Services, Inc. filed Case No. 05-10208 (hereinafter referred to as the "Debtors" herein). ABFS Consolidated Holdings, Inc. filed a petition on January 24, 2005. Based on information and belief, none of the Transfers at issue herein were made by ABFS Consolidated Holdings, Inc.

EXHIBIT A – PROPOSED ORDER

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 7
)	
AMERICAN BUSINESS FINANCIAL)	Case No. 05-10203 (MFW)
SERVICES, INC., <i>et al.</i> ¹ ,)	
)	
Debtors.)	
_____)	
)	
George L. Miller, Chapter 7 Trustee for)	
the Bankruptcy Estates of American)	
Business Financial Services, Inc., <i>et al.</i> ,)	
)	
Plaintiff,)	Adv. Proc. No. 07-50132 (KG)
v.)	
)	
Rose Piccolo,)	JURY TRIAL DEMANDED
)	
Defendant.)	Objection Deadline: August 9, 2007
_____)	

**ORDER GRANTING DEFENDANT'S
MOTION TO WITHDRAW THE REFERENCE**

Upon Defendant's Motion to Withdraw the Reference (adv. docket no. ____, the
"Motion") being duly considered on this ____ day of ____, 2007;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED**.
2. The reference of the above-captioned adversary proceeding is hereby withdrawn pursuant to 28 U.S.C. § 157(d).

SO ORDERED this ____ day of ____, 2007

UNITED STATES DISTRICT COURT JUDGE

¹ On January 21, 2005, American Business Financial Services, Inc. filed Case No. 05-10203, Tiger Relocation Company filed Case No. 05-10204, American Business Credit, Inc. filed Case No. 05-10206, Home American Credit, Inc. filed Case No. 05-10207, and American Business Mortgage Services, Inc. filed Case No. 05-10208 (hereinafter referred to as the "Debtors" herein). ABFS Consolidated Holdings, Inc. filed a petition on January 24, 2005. Based on information and belief, none of the Transfers at issue herein were made by ABFS Consolidated Holdings, Inc.

**TRANSMITTAL SHEET FOR WITHDRAWAL OF REFERENCE TO THE
U.S. DISTRICT COURT FOR THE DISTRICT OF DELAWARE**

Adversary Case #:07-50132-(KG)
Related Bankruptcy Case #:05-10203-(KG)
District Court Civil Action#:

Deputy Clerk Transferring Case: Barbara M. Torres

Case Type: (Adversary)

Nature of Suit: (547- Recover Money or Property)

Cause of Transmittal: (i.e. Order dated _____, Withdrawing the
Reference to the U.S. District Court)

Parties: George L. Miller, Ch. 7 Trustee for the Bankruptcy
Estates of American Business Financial Services,
Inc., et al. vs. Rose Piccolo

Plaintiff's Counsel: John T. Carroll, III
Cozen O'Connor
1201 North Market Street, Suite 1400
Wilmington, DE 19801
302-295-2028
jcarroll@cozen.com

Defendant's Counsel: **Christopher D. Loizides**
Loizides & Associates
1225 King Street, Suite 800
Wilmington, DE 19801
302-654-0248
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revised: 10/20/03

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF DELAWARE

DAVID D. BIRD
CLERK OF COURT

824 MARKET STREET
WILMINGTON, DE 19801
(302) 252-2900

Date: August 15, 2007


To: Clerk of Court
U.S. District Court
District of Delaware
Wilmington, DE 19801

Re: Adversary Case No.: 07-50132-(KG)
Related BK Case No.: 05-10203-(KG)

On July 27, 2007, a Motion to Withdraw the Reference to U.S.D.C. for the District of Delaware was filed in the above-mentioned case. Enclosed is a Certified Copy of the Docket Sheet, a Transmittal Sheet, and the Motion to Withdraw the Reference with any related documents for the above-mentioned case.

Please acknowledge receipt of the above transferred record by completing the information below.

Sincerely,


Barbara M. Torres, Deputy Clerk

I hereby acknowledge receipt of the above transferred record this ____ day of ____ 2007.

By: _____
Deputy Clerk

Supervisor